

16 MAG 7331

ORIGINAL

Approved: Step L  
STEPHANIE LAKE  
Assistant United States Attorney

Before: HONORABLE GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
Southern District of New York

- - - - -	X	
	:	<u>COMPLAINT</u>
UNITED STATES OF AMERICA	:	
	:	Violations of
- v. -	:	18 U.S.C. §§ 2252A and 2
	:	
PINCHAS KRUPNIK,	:	COUNTY OF OFFENSE:
a/k/a "Darragh Ofearghail,"	:	NEW YORK
	:	
Defendant.	:	
	:	
- - - - -	X	

DOC 1

SOUTHERN DISTRICT OF NEW YORK, ss.:

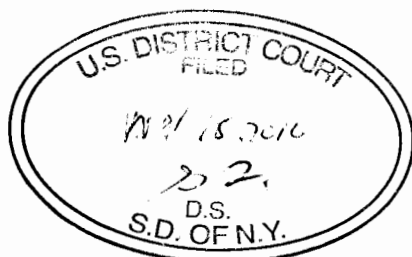
STACY SHAHRANI, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

(Receipt and Distribution of Child Pornography)

1. From at least in or about 2015 up to and including at least in or about 2016, in the Southern District of New York, PINCHAS KRUPNIK, the defendant, knowingly did receive and distribute and attempt to receive and distribute material that contains child pornography that had been mailed, and using a means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, KRUPNIK received and distributed sexually explicit images and videos of minors over the Internet.

(Title 18, United States Code, Sections 2252A(a)(2)(B),  
(b)(1), and 2.)



COUNT TWO  
(Possession of Child Pornography)

2. From at least in or about 2015 up to and including at least in or about 2016, in the Southern District of New York, PINCHAS KRUPNIK, the defendant, knowingly did possess and access with intent to view, and attempt to possess and access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material containing an image of child pornography that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, KRUPNIK possessed images of child pornography in his residence in New York, New York.

(Title 18, United States Code, Sections 2252A(a)(5)(B), (b)(2),  
and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

3. I am a Special Agent with the FBI, currently assigned to the Crimes Against Children squad. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, on my conversations with other law enforcement officials, and on my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

The Investigation

4. As set forth below, there is probable cause to believe that PINCHAS KRUPNIK, the defendant, received and possessed child pornography at his residence. Specifically, a Dropbox account containing files that constitute child pornography was accessed from an Internet Protocol ("IP") Address assigned to KRUPNIK's residence (the "Krupnik Residence"). See *infra* ¶ 9. The Dropbox account is connected, directly or indirectly, to additional accounts that list the Krupnik Residence as the

account user's address, including a PayPal account and a cellular telephone account. See *infra* ¶¶ 8-10. The PayPal account is registered directly to KRUPNIK. See *infra* ¶ 10. On the morning of November 15, 2016, the FBI executed a search warrant at the Krupnik Residence and interviewed KRUPNIK. During that interview, KRUPNIK admitted to receiving, possessing, and distributing child pornography. See *infra* ¶ 11.

5. From my review of documents and files, and from speaking with other law enforcement agents and individuals from the National Center for Missing and Exploited Children ("NCMEC"), involved in this investigation, I have learned the following, in substance and in part:

a. On or about October 15, 2015, NCMEC received a report from Dropbox regarding a user in apparent violation of Dropbox's terms of acceptable use. In particular, Dropbox reported that a particular Dropbox account (the "Dropbox Account") had violated the terms of acceptable use and uploaded files consistent with child pornography.

b. Dropbox provided NCMEC with files obtained from the Dropbox Account (the "Dropbox Records") along with the report.

6. Based on my review of the Dropbox Records, I have learned the following:

a. The Dropbox Account was registered to "Darragh Ofearghail," with a particular user email address (the "Darragh Email Address").

b. The Dropbox Account's user joined Dropbox on February 2, 2015.

c. The Dropbox Account's user paid for the user's Dropbox subscription using PayPal. The Dropbox Account's user made monthly payments of \$9.99 on August 25, 2015, September 25, 2015, and October 25, 2015. Each payment is associated with a particular transaction number.

d. The Dropbox Account's user accessed the Dropbox Account on multiple occasions, including on August 25, 2015, August 27, 2015, August 30, 2015, September 15, 2015, and September 25, 2015 from a particular IP Address (the "Target IP Address").

e. The Dropbox Account had 799 files in storage.

f. Dropbox also provided a list of file activity where the addition, deletion, and sharing of files and folders was listed from February 2, 2015, through September 30, 2015. There were at least 22 separate occasions listed in which the user of the Dropbox Account "mounted" a "shared folder." Based on my training and experience, "mounting" generally is a process by which a user makes a folder accessible. "Shared folders" are a way a user can share content with others by sharing a link to the Dropbox folder with individuals with whom the user wants to share.

7. I have reviewed the Dropbox Records. See *supra* ¶ 5(b). There were a total of 17 video and image files. Based on my training and experience, 14 of these files appeared consistent with child pornography. A representative sample of these videos is listed below, along with summary descriptions:

a. **pthc\_pedo\_laura\_-\_12-letnyaya.mp4** - This file is a partially complete download of an approximately eight minute and twenty-six second video depicting a pubescent female, approximately ten to twelve years old, and an adult male. At the beginning of the video, an adult male penis is seen in the screen with the pubescent female's vagina exposed in a lewd and lascivious manner. The adult male holds his penis around the pubescent female's vagina and the pubescent female uses her mouth to inflate what appears to be a condom. The pubescent female raises her middle finger to the camera. The adult male penetrates the pubescent female's anus with his penis. The adult male continues to penetrate the pubescent female's anus while the video focuses on the penis and the vagina.

b. **2014-12-28\_19-06-19\_055.mp4** - This file depicts a video that is approximately two minutes and twenty one seconds in length. The video begins with text on the screen that says "Tara 8 years old Ass fuck and ass vibrator." The video then depicts an adult male lying on a bed with his legs spread and his penis anally penetrating a prepubescent female. The prepubescent female is then seen on her knees with her vagina exposed. The adult male kneels to the side of the prepubescent female and inserts a white colored object which appears to be a vibrator. The adult male, at one point, spreads the prepubescent female's legs further apart, further exposing her vagina to the camera. The adult male removes the object that appears to be a vibrator from the prepubescent female's anus and places it on the bed. Then, using his hands, the adult male



spreads the prepubescent female's buttocks apart displaying her anus. The final screen is a scrolling blue screen containing the text "starring 8 year old Tara filmed February 7, 2007."

c. 4567 (1).mpg - This file is an approximately thirty-five-second video depicting a prepubescent female, approximately four to six years old, and an adult male. This video depicts an adult male penis vaginally penetrating the prepubescent female while the prepubescent female lies on her back.

d. 54323(1).mpg - This file is an approximately twenty-five-second video depicting a five to seven year old with an adult male. The prepubescent female is laying on her back wearing what appears to be a blue and white dress with Minnie Mouse on it that is pushed up to expose her legs and vagina. The adult male masturbates his penis with the penis partially inserted into the prepubescent female's vagina.

8. Based on my review of documents provided by the service provider for the Darragh Email Address, I have learned, in substance and in part, that there is a particular telephone number (the "Phone Number") associated with the Darragh Email Address.

9. Based on my review of documents provided by a telephone service provider, I have learned, in substance and in part, the following:

a. The Phone Number was registered to "Eli Krupnik" at the Krupnik Residence from November 2010 through at least November 2015.

b. The Target IP Address was assigned to "Eliezer Krupnik" at the Krupnik Residence from March 2015 through at least November 2015.

10. Based on my review of records provided by PayPal.com, I have learned, in substance and in part, that the August 25, 2015, September 25, 2015, and October 25, 2015, payments for the Dropbox Account originated from a PayPal account registered to PINCHAS KRUPNIK, the defendant (the "PayPal Account"). The PayPal Account had telephone numbers listed, including the Phone Number. The PayPal Account had a home address listed, which is the same as the address for the Krupnik Residence.

11. On or about the morning of November 15, 2016, I and other law enforcement agents executed a court ordered search warrant of the Krupnik Residence. While the search was being conducted, PINCHAS KRUPNIK, the defendant, participated in a voluntary interview, during which he made the following statements, in substance and in part:

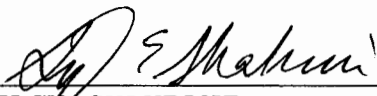
a. KRUPNIK admitted to possessing, receiving, and distributing child pornography over Dropbox and Kik.

b. KRUPNIK admitted to requesting over the Internet that four girls, who he understood to be teenaged minors, ages 14-17, send him explicit images. Two of the girls provided explicit images to him pursuant to this request.

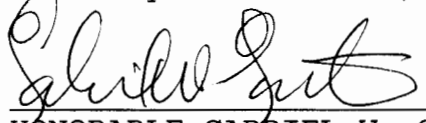
c. KRUPNIK admitted to using the Dropbox Account connected to the Darragh Email Address as well as a second Dropbox Account.

d. KRUPNIK initialed descriptions of pornographic images from the Dropbox Account that he recognized.

WHEREFORE, the deponent respectfully requests that PINCHAS KRUPNIK, the defendant, be imprisoned, or bailed, as the case may be.

  
STACY SHAHRANI  
Special AGENT  
Federal Bureau of Investigation

Sworn to before me this  
15th day of November, 2016

  
HONORABLE GABRIEL W. GORENSTEIN  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK